

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

DOUGLAS L. WRIGHT,  
BRANDON L. BAXTER,  
ANTHONY HAYNE,  
CONNOR C. STEVENS, and  
JOSHUA STAFFORD,

Defendants.

INDICTMENT

CASE NO.

JUDGE

Title 18, United States Code,  
Sections 2332a(a)(2)(B) and (D),  
844(i), and 2.

JUDGE DOWD

COUNT 1

The Grand Jury charges that:

From on or about February 20, 2012 to on or about April 30, 2012, in the Northern District of Ohio, Eastern Division, the defendants, DOUGLAS L. WRIGHT, BRANDON L. BAXTER, ANTHONY HAYNE, CONNOR C. STEVENS, and JOSHUA STAFFORD, acting without lawful authority, did knowingly conspire to use a weapon of mass destruction, specifically, a destructive device composed of two Improvised Explosive Devices (IEDs) containing C-4 plastic explosives, against property within the United States used in interstate commerce or in an activity that affects interstate commerce, namely the Brecksville-Northfield High Level Bridge, and the offense and the results of the offense would have affected interstate commerce.

All in violation of Title 18, United States Code, Section 2332a(a)(2)(B) and (D).

**COUNT 2**

The Grand Jury further charges that:

On or about April 30, 2012, in the Northern District of Ohio, Eastern Division, the defendants, DOUGLAS L. WRIGHT, BRANDON L. BAXTER, ANTHONY HAYNE, CONNOR C. STEVENS, and JOSHUA STAFFORD, acting without lawful authority, did knowingly attempt to use a weapon of mass destruction, specifically, a destructive device composed of two Improvised Explosive Devices (IEDs) containing C-4 plastic explosives, against property within the United States used in interstate commerce or in an activity that affects interstate commerce, namely the Brecksville-Northfield High Level Bridge, and the offense and the results of the offense would have affected interstate commerce.

All in violation of Title 18, United States Code, Sections 2332a(a)(2)(B) and (D), and 2.

**COUNT 3**

The Grand Jury further charges that:

On or about April 30, 2012, in the Northern District of Ohio, Eastern Division, the defendants, DOUGLAS L. WRIGHT, BRANDON L. BAXTER, ANTHONY HAYNE, CONNOR C. STEVENS, and JOSHUA STAFFORD, maliciously attempted to damage and destroy, by means of explosives, specifically, two Improvised Explosive Devices (IEDs) containing C-4 plastic explosives, real property used in interstate commerce, specifically the Brecksville-Northfield High Level Bridge, and aided and abetted each other to do the same.

All in violation of Title 18, United States Code, Sections 844(i) and 2.

A TRUE BILL.